

# STITES & HARBISON<sub>PLLC</sub>

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May 13, 2004

**RECEIVED**

MAY 13 2004

**PUBLIC SERVICE  
COMMISSION**

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## **HAND DELIVERED**

Beth O' Donnell  
Executive Director  
Public Service Commission of Kentucky  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, KY 40602-0615

**RE: P.S.C. Case No. 2004-00049**

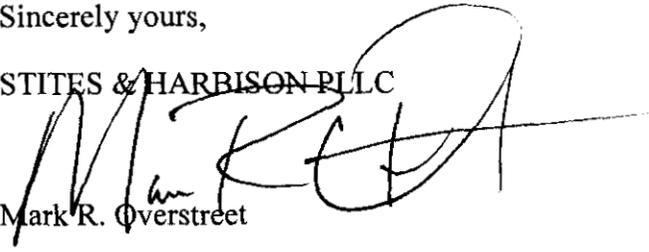
Dear Ms. O'Donnell:

Enclosed please find the original and ten copies of the Responses of Kentucky Power Company d/b/a American Electric Power to Staff Requests made at the informal conference in the above matter on April 29, 2004.

Please call me if you or the staff have any questions about these responses.

Sincerely yours,

STITES & HARBISON PLLC

  
Mark R. Overstreet

KE057:KE170:10953:1:FRANKFORT

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE**  
**PUBLIC SERVICE COMMISSION OF KENTUCKY**

**IN THE MATTER OF:**

**KENTUCKY POWER COMPANY                    )**  
**D/B/A AMERICAN ELECTRIC POWER        )**

**CASE NO. 2004-00049**

**ALLEGED FAILURE TO COMPLY WITH        )**  
**807 KAR 5:041, SECTION 3, AND         )**  
**807 KAR 5:006, SECTION 25             )**

**AEP RESPONSES TO QUESTIONS FROM**  
**APRIL 29, 2004 INFORMAL CONFERENCE**

**May 13, 2004**



**Kentucky Power**  
**d/b/a**  
**American Electric Power**

**REQUEST**

During the Company's July 2002 inspection of the Russell Bear Run Circuit No. 0106-02, please identify all deficiencies which were written up and their status.

**RESPONSE**

A listing of the items found is as follows:

Line number	Items Found	Number found
1	Lightning Arrestor	6
2	Anchor plus base & Guy Grips	1
3	8' Cross Arm and Braces	2
4	Cross Arm Brace	1
5	8' Cross Arm, Pin & Insulator	1
6	Tree Trimming Required	9

All items found have been corrected.



**Kentucky Power**  
**d/b/a**  
**American Electric Power**

**REQUEST**

A copy of all safety meeting minutes where it was discussed that coiling up service drops and placing them up out of harms way is no longer an acceptable field practice in Kentucky and the fact the acceptable field practice in Kentucky will be to de-energize the service and remove the service drop.

**RESPONSE**

Attached are copies of the safety meetings where coiling up service drops was discussed.

WEEKLY SDS SAFETY MEETING

SDS NAME: Lloyd M. Rayburn

DATE: 6/30/03

SAFETY TOPIC DISCUSSED: Line of Fire / Top 10 Safety Rules

ABNORMAL CONDITIONS: Accident of Crossarm Breaking

HAZARDS DISCUSSED: Services Rolled up on poles

SIGNIFICANT TROUBLE ISSUES: Regulator switch went BAD  
over weekend.

SHORT DESCRIPTION OF MEETING:

Discussed Top 10 Safety Rules  
AND EVERYONE in ATTENDANCE signed  
A COPY TO show Their commitment.  
READ Accident INVESTIGATION ABOUT  
CROSSARM Breaking.  
\* Discussed need to Remove services  
still HANGING on poles.  
TALKED ABOUT Regulator switch THAT  
went BAD over weekend.

# OF SAFETY OBSERVATIONS BY SUPERVISORS THIS WEEK: 4

WEEKLY SDS SAFETY MEETING

SDS NAME: Tim HALL

DATE: 3-30-04

SAFETY TOPIC DISCUSSED: CARPAL TUNNEL

ABNORMAL CONDITIONS: RECLOSED AT GRAPEVINE IS  
ABNORMAL

HAZARDS DISCUSSED:

SIGNIFICANT TROUBLE ISSUES:

**SHORT DESCRIPTION OF MEETING:**

TOPIC READ ON CARPAL TUNNEL  
PHILLIP HICKS DISCUSSED NEAR MASS AT  
HAZARD, KY DATED 3-29-04  
PHILLIP HICKS + GREG RATLIFF - DISTRICT  
SAFETY COMMITTEE - DISCUSSED PURPOSE  
AND GOALS OF COMMITTEE.  
\*DISCUSSED SERVICE DROPS ROLLED UP ON  
POLES, DANGERS, LIABILITY

# OF SAFETY OBSERVATIONS BY SUPERVISORS THIS WEEK: 5

WEEKLY SDS SAFETY MEETING

SDS NAME:

R MAYNARD

DATE:

06/19/03

SAFETY TOPIC DISCUSSED:

Mudslides + washed out culverts

ABNORMAL CONDITIONS:

HAZARDS DISCUSSED:

SIGNIFICANT TROUBLE ISSUES:

SHORT DESCRIPTION OF MEETING:

- \* Read and discussed safety performance reviews from other districts
- \* Talked about flooding + mudslides damage
- \* Discussed incident where road fell away underneath service bucket that was being turned
- \* Talked about accident where contractor made contact with service drop that had been rolled up and left hanging from pole - told employees that this is no longer an accepted practice

# OF SAFETY OBSERVATIONS BY SUPERVISORS THIS WEEK:



**Kentucky Power  
d/b/a  
American Electric Power**

**REQUEST**

Is the accepted field practice of de-energizing and removing the service drop an AEP system-wide practice or just a Kentucky practice?

**RESPONSE**

The abandoned coiled up service drop issue was discussed in detail at the Charleston Region Central Safety Meeting held on May 5, 2004 in Bluefield, West Virginia. The Charleston Region Central Safety Committee oversees distribution operations in Kentucky, West Virginia, Virginia and Tennessee.

Details were finalized during the Charleston Weekly Management meeting. The decision was that the Company's standard operating procedure is to fully de-energize, where possible, service drops coiled up on poles that are to be re-energized at some later date. When it is not possible to de-energize the service drop or when the service was disconnected at the customer's request for upgrades or repairs to the customer's facilities, the coil shall be secured to a clevis via a tie wire and all parts of the coil will be positioned to meet minimum clearance requirements of the NESC. The ends of the service drop are to be covered with Insulink connectors.



**Kentucky Power  
d/b/a  
American Electric Power**

**REQUEST**

The Commission staff requested the Company's written policy concerning coiled up service drops.

**RESPONSE**

Attached is a copy of the Company's overhead/underground circuit facilities inspection and maintenance policy.

**AEP – KENTUCKY  
OVERHEAD/UNDERGROUND CIRCUIT FACILITIES INSPECTION  
AND MAINTENANCE**

**Objective:** The objective of this program is to visually inspect all overhead and the external, above ground portions of underground facilities on a 2 year cycle to identify and correct deficiencies necessary for the safety of employees and the public under the conditions specified in the NESC and for system reliability.

**Activities Included In Program for Overhead Facilities:** The program consists of a visual inspection of poles (including foreign owned poles with company owned attachments), conductors, and pole-mounted equipment (transformer, regulators, reclosers, capacitors, etc.) and related materials (insulators, brackets, terminations, cutouts, surge arresters, etc.) owned by the company. It includes inspection of foreign attachments (CATV, telephone, etc.) to the company's poles for any safety related electrical or mechanical defects. Electrical and mechanical defects observed will be identified and the information will be collected so appropriate corrective action can be taken. Driving or foot patrol inspections are conducted as appropriate looking for obvious defects such as loose down guys, broken grounds, cracked insulators, lightning arresters with blown isolators, deteriorated crossarms having inadequate strength, etc.

**Activities Included In Program for Underground Facilities:** The program consists of an external, visual inspection of the above ground portion of underground systems including pad-mounted equipment (transformers, switches, primary metering enclosures, junction cabinets, etc.), pedestals and the underground associated components of primary riser poles. The program also includes the visual inspection of company owned outdoor lights and light poles fed from underground systems in URD developments and similar installations. The external inspection will be conducted to determine that the equipment is locked and secure and that there are no open appurtenances that might allow access to the interior of the equipment via soil erosion, cabinet or conduit deterioration or by other means such as vandalism. Oil filled equipment is also checked for any external leaks. Any defects observed that need attention will be identified and the information will be collected so appropriate corrective action can be taken.

**Inspection/Collection**

AEP personnel and contractors inspect and maintain overhead and underground facilities as a part of the 2 year cycle for the examination of distribution assets to identify defects and areas requiring attention. The Distribution Region and/or District/Areas identify the circuits to be included in the current year program based on inspection and operating history. Detail circuit maps are provided as needed by graphics personnel to be used for the inspection program which also allows for any field corrections to be documented for follow up. A listing of items to be checked as a part of this inspection is on the attached page 3.

### **How The Program Fits Into Overall Operations and Maintenance Plans:**

This program is designed to proactively identify defects involving company owned overhead and above ground portions of underground facilities so that appropriate action can be taken to reduce the possibility of an accident or correct a condition that would adversely affect system operation. The corrective actions taken are to include necessary maintenance and replacement as a part of this program. If defects should be discovered that pose a safety risk, then timely corrective action by qualified personnel is required. In rare instances the inspector may be required to guard the site of a safety hazard until qualified personnel arrive to correct the hazard. Defects involving foreign owned facilities are to be reported to the owner for correction. However, in some situations action may be required on the company's part to correct a safety hazard involving foreign owned facilities.

### **Maintenance**

Maintenance activities are identified during the inspection process and in some cases are done in conjunction with the inspection. Some of these type activities would include the replacement of property ownership tags or structure location tags, tightening of pole down guys, replacement of lock(s) for underground equipment, etc. Otherwise, the local area office schedules follow up work as appropriate.

### **Records/Reporting**

Circuit inspection results are maintained at the Region/District/Area office. This documentation includes what if any follow up action was required and when the follow up action was completed.

### **Coiled up Service Drops**

The Company's standard operating procedure is to fully de-energize, where possible, service drops coiled up on poles that are to be re-energized at some later date. When it is not possible to de-energize the service drop or when the service was disconnected at the customer's request for upgrades or repairs to the customer's facilities, the coil shall be secured to a clevis via a tie wire and all parts of the coil will be positioned to meet minimum clearance requirements of the NESC. The ends of the service drop are to be covered with Insulink connectors.

## Kentucky PSC Inspections

In the interest of public safety, to limit our liability, and to comply with PSC requirements, a periodic and systematic inspection of all our facilities is necessary.

The following are the general guidelines for what to look for as a part of this inspection:

\* Condition of pole:

- Rotten
- Leaning or Washed out
- Burned
- Broken / split
- Other

\* Condition of crossarm and crossarm braces

- Broken / split
- Other

\* Pole ground intact

- Broken / missing ground wire molding
- Loose connections

\* Hardware damaged

- Lightning arrester
- Cutout
- Insulators

\* Guys and anchors

- Loose
- Damaged
- Need insulator / breaker / marker

\* Transformers / Other Equipment

- Unused
- Overloaded
- Leaking
- Damaged

\* Conductors

- Proper clearance
- Unused
- Damaged – broken strands
- Excessive splices
- Loose tie wire

- Coiled up service drop on pole(Note if energized or de-energized)
  - Securely tied to clevis or other pole hardware?
  - Will this drop be needed in the next year?
  - Proper clearance
  - Ends of wire insulated

\*Attachments

- Clearance issues

\* Pole tags

- Damaged / missing

Report immediately any hazardous conditions that could endanger life or property, or cause an outage.



**Kentucky Power Company  
d/b/a  
American Electric Power**

**REQUEST:**

Provide KPCo's most recent electrical contact cases before the Commission.

**RESPONSE:**

The following is a description of the electrical contact cases before the Commission during the last five years:

**Case No. 2002-00138**

Date of Accident: February 8, 2002

PSC Show Case Order Dated: June 28, 2002

Alleged Violation of 807KAR5:041(3) - which requires electric utilities to operate and maintain facilities in conformance to NESC rules. Accident: Two boys riding double on ATV four-wheeler and pulled up to a down guy wire installation attached to KPCo pole. They grabbed hold of the down guy near its anchor point and said they felt a shock. KPCo filed and Commission accepted Settlement Agreement dated August 19, 2002. Company assessed and paid penalty of \$1,750.

**Case No. 2000-00207**

Date of Accident: March 24, 2000

PSC Show Case Order Dated: May 9, 2000

Alleged failure to comply with 807KAR5:041(3)(1)(c) Noncompliance of NESC standards. Accident involving two employees of Ferguson Contracting. While apparently re-positioning portable scaffolding at Appalachian Regional Hospital, Whitesburg, came in contact with electric line. The scaffold was too tall to be moved under the communications and neutral conductors. Both men were located on scaffolding lifting communication conductor and neutral over the scaffolding supports when one man contacted the center phase of an overhead energized 7200 volt line. The second man also received injuries due to the contact. After the PSC Staff investigated and filed a Utility Accident Report, the Commission issued formal show case order alleging AEP violated KAR5:041(3)(1)(c) by failing to comply with standards of the NESC and alleging that BellSouth also failed to comply with standards of NESC and 807KAR5:006(26A) failure to notify PSC with the 2 hrs of discovery of accident. Settlement Agreement filed February 14, 2001. AEP and BellSouth showed evidence that they had worked with the Associated General Contractors of Kentucky to educate that organization on the importance of safety around electrical lines. PSC accepted Settlement Agreement on March 16, 2001. KPCo admits no liability. No penalty assessed.

**Case No. 99-137**

Date of Accident: July 28, 1998

PSC Show Case Order Dated: April 21, 1999

Alleged failure to comply with 807KAR5:041(3)(1) Noncompliance of NESC rules. Accident on July 28, 1998 involving three Pike Electrical contractor workers (doing work for AEP). While lifting grounding cable, cable touched A-phase of 12 kV primary and energized crew truck. One man made contact with energized vehicle and was burned. KPSC assessed and paid \$5,250 penalty.

**Case No. 98-591**

Date of Accident: July 8, 1998

PSC Show Case Order dated: November 20, 1998

Alleged violation of 807KAR5:006(26)(1)(a) failure to notify PSC within 2 hrs of accident. Accident: KPC employee injured when transformer pole installation he had climbed fell with him. He had sounded and tested the pole before climbing. Transported to hospital in Pikeville and later that evening to Lexington. KPC failed to notified PSC until next day. Penalty: \$500 however \$400 suspended as long as KPC does not violate this regulation within 1 year. Penalty Paid: \$100